

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARION KILER,

Plaintiff,

v.

MONTPARNASSE 56 CHICAGO, LLC,

Defendant.

No.: 1:19-cv-2073

Judge Edmond E. Chang

JOINT MOTION TO STAY PROCEEDINGS

Plaintiff, Marion Kiler, by and through her attorney, C.K. Lee of Lee Litigation Group, PLLC, hereby moves this Court to stay proceedings and adjourn all dates and deadlines, *sine die*, including, but not limited to, the answer due July 24, 2019 and the status hearing currently scheduled for August 6, 2019 at 9:00 a.m, with leave to file a stipulation of dismissal in thirty (30) days.

In support, Plaintiff states as follows:

1. On March 26, 2019, Plaintiff filed a Complaint against Defendant (Docket No. 1).
2. On June 21, 2019, Defendant's counsel, William Pokorny, filed a Joint Motion for Continuance of June 26, 2019 Status Hearing and Extension of Time to Answer Complaint (Docket No. 15).
3. On June 25, 2019, this Court Ordered that Defendant's answer was due July 24, 2019 and the status hearing was reset to August 6, 2019 at 9:00 a.m.
4. As of today's date, the parties have reached a settlement in principle and seek additional time to finalize the settlement documents.

5. Defendant joins in Plaintiff's request to stay proceedings and adjourn all dates and deadlines, *sine die*.

WHEREFORE, Plaintiff, Marion Kiler, by and through her attorney, C.K. Lee of Lee Litigation Group, PLLC, respectfully requests that the Court stay proceedings and adjourn all dates and deadlines, *sine die*, including, but not limited to, the answer due July 24, 2019 and the status hearing currently scheduled for August 6, 2019 at 9:00 a.m., with leave to file a stipulation of dismissal in thirty (30) days.

Dated: July 17, 2019

Respectfully submitted,

By: /s/ C.K. Lee
C.K. Lee, Esq.

LEE LITIGATION GROUP, PLLC
C.K. Lee, Esq.
73 West Monroe Street
Chicago, IL 60603
Tel.: 212-465-1188
Fax: 212-465-1181
Email: ckleee@leelitigation.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he filed the foregoing JOINT MOTION TO STAY PROCEEDINGS with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record on this 17th day of July, 2019.

William R. Pokorny
wrp@franczek.com
John E. Swinney
js@franczek.com
Franczek P.C.
300 South Wacker Drive, Suite 3400
Chicago, IL 60606
Tel: (312) 986-0300
Fax: (312) 986-9192

/s/ C.K. Lee
C.K. Lee, Esq.